From: Marsh, Karen

Sent: Wednesday, May 15, 2019 03:58 PM

To: Ostrand, Laurie; Mia, Marcia; Hambrick, Amy

CC: Witosky, Matthew

Subject: RE: MACT HH and NSPS 0000a

+Matt

We had a similar question come in a few weeks ago.

Karen R. Marsh, PE

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From: Ostrand, Laurie

Sent: Wednesday, May 15, 2019 11:53 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy

<Hambrick.Amy@epa.gov>

Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: FW: MACT HH and NSPS 0000a

Hi all

MACT HH, at 63.769(b), says: "This section does not apply to ancillary equipment and compressors for which the owner or operator is subject to and controlled under the requirements specified in 40 CFR part 60, subpart 0000."

NSPS 0000, at 60.5370(d), says: "You are deemed to be in compliance with this subpart if you are in compliance with all applicable provisions of subpart 0000a of this part."

So is a facility subject to the MACT HH LDAR requirements if they are complying with OOOOa?

Thanks

Laurie Ostrand

U.S. Environmental Protection Agency

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